

**CORPORATE SOCIAL RESPONSIBILITY ('CSR')
POLICY**



JAIDEEP ISPAT AND ALLOYS PRIVATE LIMITED
For the FY 23-24

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I. INTRODUCTION & PREAMBLE

At Jaideep Ispat And Alloys Private Limited ('Company'), the Corporate Social Responsibility (CSR) has been an integral part of the way the Company had been doing our business since inception. Company's CSR initiatives have played a pivotal role in improving the lives of the communities and society, environment at large & giving preference to the local areas around the areas where Company operates. This has been done with the objective of energizing, involving, and enabling these communities to realize their potential. This has also enabled us to fulfill our commitment to be a socially responsible corporate citizen.

II. PURPOSE AND OBJECTIVE

The purpose of this document is to outline the policies and procedures for Corporate Social Responsibility ('CSR') for Jaideep Ispat And Alloys Private Limited ('Company').

Establish a guideline for compliance with the provisions of the Act and Rules related to CSR,
Implement CSR initiatives in both letter and spirit through appropriate procedures and reporting, and initiate projects that benefit the community at large.

Our main Objective of conducting CSR Activity is :

- To undertake projects/programs which will enhance the quality of life, protection of the environment, economic well-being of the communities.
- To strive for economic development that positively impacts the society at large with minimal resource footprint.
- To embrace responsibility for the Company's actions and encourage a positive impact through its activities on hunger, poverty, malnutrition, environment for communities, stakeholders and the society.
- To make contributions to organizations who are undertaking CSR activities as per the CSR objectives of the Company.
- To comply with requirements of the Companies Act, 2013 for CSR Expenses, which as of now is 2% of the average net profit during the immediately preceding 3 financial years.
- To establish a guideline for compliance with the provisions of the Act and Rules related to CSR,
- To implement CSR initiatives in both letter and spirit through appropriate procedures and reporting, and initiate projects that benefit the community at large.

III. DEFINITIONS

- a) **"Company"** means Jaideep Ispat and Alloys Private Limited
- b) **"Act"** means the Companies Act, 2013 (18 of 2013);
- c) **"Administrative overheads"** means the expenses incurred by the company for 'general management and

administration' of Corporate Social Responsibility functions in the company but shall not include the expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular Corporate Social Responsibility project or programme;

d) "**Annexure**" means the Annexure appended to these rules;

e) "**Corporate Social Responsibility (CSR)**" means the activities undertaken by a Company in pursuance of its statutory obligation laid down in section 135 of the Act in accordance with the provisions contained in these rules, but shall not include the following, namely:-

i. activities undertaken in pursuance of normal course of business of the company:

Provided that any company engaged in research and development activity of new vaccine, drugs and medical devices in their normal course of business may undertake research and development activity of new vaccine, drugs and medical devices related to COVID-19 for financial years 2020-21, 2021-22, 2022-23 subject to the conditions that-

a) such research and development activities shall be carried out in collaboration with any of the institutes or organizations mentioned in item (ix) of Schedule VII to the Act;

b) details of such activity shall be disclosed separately in the Annual report on CSR included in the Board's Report;

ii. any activity undertaken by the company outside India except for training of Indian sports personnel representing any State or Union territory at national level or India at international level;

iii. contribution of any amount directly or indirectly to any political party under section 182 of the Act;

iv. activities benefitting employees of the company as defined in clause (k) of section 2 of the Code on Wages, 2019 (29 of 2019);

v. activities supported by the companies on sponsorship basis for deriving marketing benefits for its products or services;

vi. activities carried out for fulfillment of any other statutory obligations under any law in force in India;

f) "**CSR Committee**" means the Corporate Social Responsibility Committee of the Board referred to in section 135 of the Act;

g) "**CSR Policy**" means a statement containing the approach and direction given by the board of a company, taking into account the recommendations of its CSR Committee, and includes guiding principles for selection, implementation and monitoring of activities as well as formulation of the annual action plan;

h) "**International Organization**" means an organization notified by the Central Government as an international organization under section 3 of the United Nations (Privileges and Immunities) Act, 1947 (46 of 1947), to which the provisions of the Schedule to the said Act apply;

i) **"Net profit"** means the net profit of a company as per its financial statement prepared in accordance with the applicable provisions of the Act, but shall not include the following, namely: -

- i. any profit arising from any overseas branch or branches of the company, whether operated as a separate company or otherwise; and
- ii. any dividend received from other companies in India, which are covered under and complying with the provisions of section 135 of the Act:

Provided that in case of a foreign company covered under these rules, net profit means the net profit of such company as per profit and loss account prepared in terms of clause (a) of sub-section (1) of section 381, read with section 198 of the Act;

j) **"Ongoing Project"** means a multi-year project undertaken by a Company in fulfilment of its CSR obligation having timelines not exceeding three years excluding the financial year in which it was commenced, and shall include such project that was initially not approved as a multi-year project but whose duration has been extended beyond one year by the board based on reasonable justification;

k) **"Public Authority"** means 'Public Authority' as defined in clause (h) of section 2 of the Right to Information Act, 2005 (22 of 2005);

l) **"Section"** means a section of the Act.

Words and expressions used in this CSR Policy and not defined herein but defined under the Act shall have the meaning respectively assigned to them in the Act.

IV. APPLICABILITY OF CSR COMMITTEE

As per section 135(1) of the Companies Act, 2013, Every company having net worth of rupees five hundred crore or more, or turnover of rupees one thousand crore or more or a net profit of rupees five crore or more during 3[the immediately preceding financial year] shall constitute a Corporate Social Responsibility Committee of the Board consisting of three or more directors, out of which at least one director shall be an independent director.

Provided that where a company is not required to appoint an independent director under sub-section (4) of section 149, it shall have in its Corporate Social Responsibility Committee two or more directors.

If the amount to be spent by a company under sub-section (5) of section 135 of the Act does not exceed fifty lakh rupees, the requirement under sub-section (1) of section 135 of the Act for constitution of the Corporate Social Responsibility Committee shall not be applicable and the functions of such Committee provided under section 135 shall, in such cases, be discharged by the Board of Directors of the company.

If the amount to be spent by a company under sub-section (5) of section 135 of the Act exceed fifty lakh rupees the Company shall constitute CSR Committee:

The CSR Committee shall consist of two or more Directors, as may be deemed fit by the Board. The Committee shall meet, whenever required, to discuss and review CSR activities and Policy.

Quorum for the CSR Committee Meeting shall be one-third of its total strength (any fraction contained in that one-

third be rounded off as one) or two members, whichever is higher.

The Committee members may attend the meeting physically or via such audiovisual means as permitted under the Act. The Committee shall have the authority to invite such employee(s), senior official(s) and or external experts, as it may deem fit, to attend the CSR Committee Meeting(s). The Company Secretary, if any, shall act as Secretary to the Committee.

The committee shall be responsible for the Planning/ implementation/ monitoring and review of this policy and various projects/activities undertaken under the policy.

The CSR Committee shall submit periodical Quarterly reports to the board of directors.

A. Composition of the CSR Committee members is as follows:

- a) The Committee shall be constituted with the Directors of the Company with minimum two directors.
- b) The Committee shall appoint a Personnel from the Company who shall act as Secretary to the Committee.
- c) The Chairman of the Committee can be any member of the Committee.
- d) The members of the Committee shall be elected by the Board of the Company.
- e) Tenure of the Membership in the Committee shall be based on the tenure of the Directorship in the Company.

As the provisions of the Corporate Social Responsibility is applicable on the company and accordingly the company has formulated the CSR Committee which consists of following.

S. No	Name	Designation in Committee	DIN/ PAN
1	Mr. Pawan Singhania	Chairman – Managing Director	DIN: 00390905
2	Mr. Amit Kishanpuria	Member – Director	DIN: 05192565
3	Mr. Sandeep Jain	Member – Director	DIN: 05192693
4.	Mr. Abhishek Mahajan	Company Secretary	PAN:AMSPM8673K

CSR Sub-Committee shall be formed which shall be responsible for the Meeting the Objectives of CSR Policy and shall conduct quarterly meetings.

Note:

- Members of CSR Committee shall be permanent invitees of the CSR Sub-Committee Meetings for monitoring activities of the sub-committee.
- As per Rule 9 of The Companies (Corporate Social Responsibility Policy) Rules, 2014- The Board of Directors of the company shall, after taking into account the recommendations of CSR Committee, approve the CSR Policy for the company and disclose contents of such policy in its report and the same shall be displayed on the company's website, if any, as per the particulars specified in the Annexure.

Hence The Composition of CSR Committee shall be placed on Company's website www.moirasariya.com.

- The composition of the Committee shall be disclosed in the Board's Report.
- **Minutes of the Meeting**
 - i. The Secretary of the CSR Committee or any other authorized person shall minute the proceedings and decisions of all the meetings of the Committee including the names of those who are present and in attendance.
 - ii. Draft minutes of Committee meetings shall be circulated promptly to all the Members of the Committee and should be signed by the Chairman of that Meeting not later than 30 days after the meeting.
 - iii. Once approved, minutes should be circulated to all other members of the committee and shall be taken on record in the immediately subsequent meeting of the committee.

c) Notice of the Meeting:

Meeting shall be called by Secretary at the request of the Chairman of the CSR committee of the Company.

Unless otherwise agreed, notice of each meeting confirming the venue, time and date together with an agenda of items to be discussed, shall be forwarded to each member of the Committee, any other person required to attend not later than seven days before the date of the meeting.

The CSR Committee may invite Executives, Advisors, representatives of Social Organizations, Auditors of the Company and such other person (s) as it may consider necessary to attend the meeting

B. ROLES AND RESPONSIBILITIES OF CSR COMMITTEE

The **CSR Committee and CSR Sub Committee** of the Board will be responsible to:

- (a) Formulate and recommend to the Board a CSR policy, which shall indicate the activities to be undertaken by the Company in the area or subject as specified in Schedule VII of the Companies Act, 2013.
- (b) Formulate and recommend to Board the Annual Action Plan in pursuance to the CSR Policy, which shall include the following, namely:
- List of CSR Project or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
 - Manner of execution of such projects or programmes as specified in (a) above;
 - the modalities of utilization of funds and implementation schedules for the projects or programmes;
 - monitoring and reporting mechanisms for the project or programmes; and
 - details of Need and Impact Assessments, if any, for the projects undertaken by the company

Provided, the Board may alter such plan at any time during the financial year, as per the recommendations of its CSR Committee, based on the reasonable justification to that effect.

- (c) Recommending the amount of expenditure to be incurred on the CSR activities.
- (d) Utilization of Fund [Rule 4(5)] The Board of a company shall satisfy itself that the funds disbursed to the entities for CSR have been utilized for the purposes and in the manner as approved by it and the Chief Financial Officer or the person responsible for financial management shall certify to the effect.
- (e) Disclosing the content of the policy, including projects undertaken, in its report and in the company's web-site,
- (f) Monitoring the implementation of the activities included in the CSR policy and
- (g) Monitoring the spends on CSR activities by the Company in each financial year, in terms of the relevant Companies Act, 2013. In computing such profit, the wholly owned and partly owned subsidiaries shall not be considered.
- (h) Monitor the CSR policy from time to time.
- (i) Seeking a monitoring and implementation report from the organizations receiving funds.

(j) Delegating a designated company official to coordinate with the organization receiving funds to inspect the activities undertaken and ensure information in a timely manner.

(k) Roles and Responsibilities of CSR Sub- Committee members shall be determined at the start of the Project (shall be mentioned in Company's CSR Annual Document) in and a Project team leader shall be assigned to the Project who shall be responsible for the overall execution and reporting of the Project.

(l) Promote the culture of giving back to society among employees.

Additionally, the Committee may empower any director to spend such an amount as they think appropriate for some other strategic CSR contingencies that may arise during any financial year.

V. CSR Expenditure:

- a) The Company, in every Financial Year, shall endeavor to spend such feasible amount as CSR Expenditure, which shall not be restricted by the statutory limit of a specified percentage of its average net profits of the immediately preceding three Financial Years. However, the aforementioned CSR Expenditure in any Financial Year shall be at least 2% of Company's average Net profits for the three immediately preceding Financial Years.
- b) The CSR Committee shall prepare a CSR Annual Plan for the above which shall include: i. Identified CSR Projects and CSR expenditure
- c) Implementation Schedules
- d) Total expenditure in the CSR Annual Action Plan shall be approved by the Board upon recommendation by the CSR Committee
- e) At the time of CSR expenditure preference will be given to the Local areas around it where it operates. However, this shall not bar the Company from pursuing its CSR objects in other areas.
- f) Average Net Profit shall be calculated in accordance with the provision of Section 198 of the Companies Act, 2013.

VI. CSR ACTIVITIES / PROGRAMMES / PROJECTS

The Policy recognizes that corporate social responsibility is not merely compliance; it is a commitment to support initiatives that measurably improve the lives of underprivileged section of the society by one or more of the focus areas as outlined below.

A. CSR Activities may include the following activities relating to:—

- (i) Eradicating hunger, poverty and malnutrition, “promoting health care including preventive health care” and sanitation including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water.

- (ii) Promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly and the differently abled and livelihood enhancement projects.
- (iii) Promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups.
- (iv) Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water including contribution to the Clean Ganga Fund set-up by the Central Government for rejuvenation of river Ganga.
- (v) Protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional art and handicrafts;
- (vi) Measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;
- (vii) Training to promote rural sports, nationally recognized sports, paralympic sports and Olympic sports
- (viii) Contribution to the prime minister's national relief fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the central govt. for socio economic development and relief and welfare of the schedule caste, tribes, other backward classes, minorities and women;
- (ix) (a) Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and
- (ix) (b) Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).
- (x) rural development projects
- (xi) slum area development.

Explanation.- For the purposes of this item, the term 'slum area' shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.

- (xii) disaster management, including relief, rehabilitation and reconstruction activities.
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(xiii) or any other matter as be inserted in the Schedule VIII from time to time through various Circulars/Notifications as provided by Ministry of Corporate Affairs from time to time.

B. Exclusions from CSR Activities:

Rule 2(1)(d) of the Companies (CSR Policy) Rules, 2014 defines CSR and the following activities are specifically excluded from being considered as eligible CSR activity:

- (i) Activities undertaken in pursuance of normal course of business of the company. However, exemption is provided for three financial years, till FY 2022-23, to companies engaged in R&D activities for new vaccines, drugs, and medical devices in their normal course of business, related to COVID19. This exclusion is allowed only in case the companies are engaged in R&D in collaboration with organisations as mentioned in item (ix) of Schedule VII and disclose the same in their Board reports.
- (ii) Activities undertaken outside India, except for training of Indian sports personnel representing any State or Union Territory at national level or India at international level;
- (iii) Contribution of any amount, directly or indirectly, to any political party under section 182 of the Act;
- (iv) Activities benefitting employees of the company as defined in section 2(k) of the Code on Wages, 2019;
- (v) Sponsorship activities for deriving marketing benefits for products/services;
- (vi) Activities for fulfilling statutory obligations under any law in force in India.
- (vii) The Corporation will abstain from carrying out the following activities under CSR that may create dissatisfaction in any section of the Society:-
 - a. activities concerned with religion like construction of temple/mosque etc.
 - b. activities disturbing social harmony in any manner.
 - c. such other activities as may be prohibited by Central Government

C. Focus Areas

In accordance with the requirements under the Companies Act, 2013 and in line with the Schedule VII to the Companies Act, 2013, Company's CSR activities, amongst others, will focus on:

- **EDUCATION:** Promoting education, including special education and employment- enhancing vocational skills especially among children, women, elderly and the differently abled, and livelihood enhancement projects; monetary contributions to academic institutions for establishing endowment funds, providing infrastructure, chairs, laboratories, etc., with the objective of assisting students in their studies.
- **ENVIRONMENTAL SUSTAINABILITY:** Ensuring environmental sustainability, ecological balance, water harvesting, pond deepening, protection of flora and fauna, animal welfare, agroforestry, conservation of

natural resources and maintaining the quality of soil, air and water.

- **RURAL DEVELOPMENT PROJECTS:** Strengthening rural areas by improving accessibility, housing, drinking water, sanitation, power and livelihoods, thereby creating sustainable villages.
- **HUNGER, POVERTY, MALNUTRITION AND HEALTH:** Eradicating hunger, poverty and malnutrition, conducting health awareness programmes, promoting preventive healthcare and sanitation and making available safe drinking water.
- **GENDER EQUALITY AND EMPOWERMENT OF WOMEN:** Promoting gender equality and empowering women; setting up homes, hostels and day care centers for women and orphans; setting up old age homes and such other facilities for senior citizens; and adopting measures for reducing inequalities faced by socially and economically backward groups.
- **NATIONAL HERITAGE, ART AND CULTURE:** Protecting national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promoting and developing traditional arts and handicrafts.

D. OUR CSR ENDEAVOURS

The scope of the CSR activities of the Company will cover the following areas but would not be limited to the same and may extend to other specific projects/ programs as permitted under the law from time to time. Names of the Project defined for different areas of CSR activities undertaken by Company have been given as under:

S. No	Project Names	Area [Activities Conducted]	Clause of Schedule VII of Companies Act, 2013
1	Project Sanjeevani	Promoting health care (including preventive health care) and sanitation. [Conducting Medical Camps, Health awareness programmes, Building infrastructure for Hospitals, Distribution of free medicines, construction of washrooms, Setting up of Sanitary-Napkins Vending Machines in girls schools, providing water purifiers, donations for fight against Cancer and Thalassemia, etc.]	Clause (i)
2	Project Gyan Jyoti	Promoting education for children by construction and	Clause (ii)

		<p>development of schools, by financial assistance.</p> <p>[Providing Infrastructure to schools, civil, furniture and fixtures, digital and scientific equipment, data processing computers to schools, salaries to teachers, Sponsorship of school fees to students from weaker sections of society, conducting Career Counselling Programmes etc.]</p>	
3	Project - Go Green	<p>Ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, conservation of natural resources, water harvesting and maintaining quality of soil, air and water.</p> <p>[Pond Deepening, Building Boundary wall around ponds, Water Harvesting under 'Jal Shakti Mission', Providing water filters, provision of cotton/cloth bags to reduce the use of plastic consumption under 'Swachh Bharat Abhiyan', Providing dustbins/ Trash Barrel under contribution to 'Swachh Bharat Abhiyan'</p>	Clause(iv)
4	Project - Save Water Save Life		
5	Miscellaneous	Ensuring social help in disaster management managing relief, rehabilitation and reconstruction activities.	Clause (xii)

VII. BUDGETING, PLANNING, IMPLEMENTATION - EXECUTION AND MONITORING

A. Budgeting :

As per the CSR policy, a budget for various CSR Activities shall be approved at the start of the year and shall be sent to Board for Approval. Adhering to Rule 7 of the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021, the Board shall ensure that the administrative overheads shall not exceed 5% of total CSR Expenditure of the Company for the financial year.

As per Rule 7(3) of the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021, where a company spends an amount in excess of requirement provided under section 135(5), such excess amount may be set off against the requirement to spend under section 135(5) upto immediate succeeding three financial years subject to conditions that:

- the excess amount available for set off shall not include the surplus arising out of the CSR activities, if any,
- the Board of the Company shall pass a resolution to that effect.

B. Planning :

Planning and Proposals for new CSR activities, as and when done/received, shall be evaluated by the CSR Committee in terms of appropriateness and alignment with the CSR policy of the Company.

C. Implementation and Execution :

For implementation and execution of Projects the responsibilities are assigned to the committee members/ sub-committee members.

The Board shall ensure CSR activities are undertaken by the Company itself or through Implementing Agencies.

Rule 4(1) of the Companies (CSR Policy) Rules, 2014 provides the eligible entities which can act as an implementing agency for undertaking CSR activities. These are:

- (i) Entity established by the company itself or along with any other company – a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961.
- (ii) Entity established by the Central Government or State Government – a company established under section 8 of the Act, or a registered trust or a registered society.
- (iii) Statutory bodies – any entity established under an Act of Parliament or a State legislature.
- (iv) Other bodies – a company established under section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.

The Social Responsibility Initiative of the Company shall be implemented either directly or through Moira Welfare Foundation, which may implement the CSR programs/projects of the Company either on its own or it may appoint another trust, society or Section 8 company for the purpose of implementing CSR activities on behalf of Moira Welfare Foundation /Company as may be considered appropriate to complete the CSR project under the agreement as may be executed by the Company with Moira Welfare Foundation. Provided, the recipient organization is eligible to receive CSR funds under the Act i.e. registered as a trust, society, or Section 8 company and must have a track record of undertaking similar activities and is eligible to undertake CSR activities in compliance with the Act, and the Rules made thereunder and such amount is properly documented and utilized for the intended purpose.

VIII. MODUS OPERANDI

1. The implementing agency viz. Moira Welfare Foundation can undertake the CSR activities either directly or through other trusts, society or section 8 Company eligible to undertake CSR activities.
2. Moira Welfare Foundation can also undertake the CSR projects either completely or partially for

implementation of the CSR activities.

3. In any of the case above, Moira Welfare Foundation will be responsible for:

- a) Maintenance of proper records of the CSR projects/activities
- b) Providing Project/activity wise utilization of the CSR funds to the Company
- c) Providing Receipts of CSR funds given by the Company
- d) Obtaining receipts and CSR Utilization certificates from third parties to whom it has further provided CSR funds
- e) Sharing Progress report of CSR projects/activities with the Company on a regular basis
- f) To ensure that the execution of CSR projects/activities are in conformation with the CSR policy of the Company and the provisions of section 135 of the Companies Act, 2013 and rules made thereunder as amended from time to time.

4. Any amount directly given by the Company towards CSR should not be treated as Corpus by Moira Welfare Foundation or by the recipient entity, in case Moira Welfare Foundation has further given CSR funds to other trust, society or section 8 company for undertaking CSR activities.

IX. MONITORING,

- a) Maintenance of proper records of the CSR projects/activities
- b) Providing Project/activity wise utilization of the CSR funds to the Company
- c) Providing Receipts of CSR funds given by the Company
- d) Obtaining receipts and CSR Utilization certificates from third parties to whom it has further provided CSR funds
- e) Sharing Progress report of CSR projects/activities with the Company on a regular basis
- f) To ensure that the execution of CSR projects/activities are in conformation with the CSR policy of the Company and the provisions of section 135 of the Companies Act, 2013 and rules made thereunder as amended from time to time.

a. Registration with Central Government

The entity who intends to undertake any CSR activity, shall register itself with the Central Government by filing the form CSR-1 electronically with the Registrar, with effect from the 1st day of April 2021:

Provided that the above provisions shall not affect the CSR projects or programmes approved prior to the 1st day of April 2021.

b. Monitoring

On a quarterly basis, the actual expenditure vis-à-vis the budget shall also be placed before the CSR Committee/ Board for review.

c. Reporting

CSR REPORTING: As per Rule 8 of the Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021, The Board's Report of a company covered under these rules pertaining to any financial year shall include an annual report on CSR containing particulars specified in Annexure I or Annexure II, as applicable.

With reference to Notification G.S.R – (E) dated February 11, 2022,

"(1B) Every company covered under the provisions of sub-section (1) to section 135 shall furnish a report on Corporate Social Responsibility in Form CSR-2 to the Registrar for the preceding financial year (2020-2021) and onwards as an addendum to Form AOC-4 or AOC-4 XBRL or AOC-4 NBFC (Ind AS), as the case may be.

X. IMPACT ASSESSMENT

The purpose of impact assessment is to assess the social impact of a particular CSR project. The intent is to take considered decisions before deploying CSR amounts and assess the impact of CSR spending. This not only serves as feedback to plan and allocate resources better but shall also deepen the impact of CSR.

- a) Every company having average CSR obligation of ten crore rupees or more in pursuance of sub-section (5) of section 135 of the Act, in the three immediately preceding financial years, shall undertake impact assessment, through an independent agency, of their CSR projects having outlays of one crore rupees or more, and which have been completed not less than one year before undertaking the impact study.
- b) The impact assessment reports shall be placed before the Board and shall be annexed to the annual report on CSR.
- c) A Company undertaking impact assessment may book the expenditure towards Corporate Social Responsibility for that financial year, which shall not exceed five percent of the total CSR expenditure for that financial year or fifty lakh rupees, whichever is less. ”.

XI. UTILIZATION OF FUND

The Board of a company shall satisfy itself that the funds so disbursed have been utilized for the purposes and in the manner as approved by it and the Chief Financial Officer or the person responsible for financial management shall certify to the effect.

XII. GENERAL

- a. Any surplus arising out of the CSR activities shall not form part of the business profit of a company and shall be ploughed back into the same project or shall be transferred to the Unspent CSR Account and spent in pursuance of CSR policy and annual action plan of the company or transfer such surplus amount to a Fund specified in Schedule VII, within a period of six months of the expiry of the financial year.
- b. Where a company spends an amount in excess of requirement provided under sub-section (5) of section 135, such excess amount may be set off against the requirement to spend under sub-section (5) of section 135 up to immediate succeeding three financial years subject to the conditions that –
 - i. the excess amount available for set off shall not include the surplus arising out of the CSR activities, if any.
 - ii. the Board of the company shall pass a resolution to that effect.
- C. The CSR amount may be spent by a company for creation or acquisition of a capital asset

- D. In case of any doubt with regard to any provision of the policy and also in respect of matters not covered herein, a reference to be made to the CSR Committee. In all such matters, the decision of the CSR Committee shall be final.
- E. Any or all provisions of the CSR Policy would be subject to revision/amendment in accordance with the Companies Act, 2013, rules and regulations as may be prescribed by the Central Government, from time to time.
- F. The Company reserves the right to modify, cancel, add, or amend any of these Rules.

XIII. TRANSFER OF UNSPENT CSR AMOUNT

Until a fund is specified in Schedule VII for the purposes of subsection (5) and (6) of section 135 of the Act, the unspent CSR amount, if any, shall be transferred by the company to any fund included in schedule VII of the Act.”

XIV. DISCLOSURES

The Board Report of Company shall disclose the Content of policy, Composition of CSR Committee, CSR initiatives undertaken by Company, the CSR spend during the financial year, and other information as required by the prevailing law.

Display of CSR Policy on website:

These details are placed on the Company's website www.moirasariya.com.

For, Jaideep Ispat and Alloys Private Limited

SD/-

Abhishek Mahajan

Company Secretary

A32961

Place: Indore

Date: 23.05.2023